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GOOGLE LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO**

ANIBAL RODRIGUEZ, *et al.* individually and
on behalf of all other similarly situated,

Plaintiffs,

vs

GOOGLE LLC, *et al.*

Defendant.

Case No. 3:20-CV-04688 RS

**DECLARATION OF STEVE GANEM IN
SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION TO SEAL
JOINT LETTER BRIEF RE: GOOGLE
PRESERVATION**

*[Declaration of Eduardo E. Santacana in Support
of Administrative Motion to Seal filed
concurrently herewith]*

Judge: Hon. Alex G. Tse
Courtroom: A – 15th Floor
Trial Date: Not Yet Set

1 I, STEVE GANEM, declare:

2 1. I am a Group Product Manager at Google LLC (“Google”) with supervisory
3 authority concerning Google Analytics for Firebase (“GA for Firebase”). In my role as Group
4 Product Manager, I am familiar with Google’s practices regarding the treatment of sensitive
5 business and technical information.

6 2. Unless otherwise stated, the facts I set forth in this declaration are based on my
7 personal knowledge or knowledge I obtained through my review of corporate records or other
8 investigation. If called to testify as a witness, I could and would testify competently to such facts
9 under oath.

10 3. I submit this declaration in support of the Administrative Motion to Consider
11 Whether Another Party’s Material Should be Sealed filed by Plaintiffs. ECF No. 166.

12 4. I have reviewed portions of (1) the Joint Letter Brief regarding Google’s
13 preservation (“Preservation Joint Letter Brief”) that have been designated for sealing (ECF No.
14 166-2); and (2) my declaration in support of the Preservation Joint Letter Brief (“Ganem
15 Declaration”) (ECF No. 166-3).

16 5. Portions of **page 3, paragraph 3, lines 4-8 and 12-13 of the Preservation Joint**
17 **Letter Brief** that have been filed under seal disclose confidential and proprietary information
18 relating to the raw data Google collects through GA for Firebase. The figures Google seeks to
19 seal include the specific number of event-level data entries Google logs per day in its app
20 measurement logs. Other figures would allow a reader to reverse calculate the number of GA for
21 Firebase log entries because those figures disclose the amount of data collected measured in
22 bytes, the cost to store such data, and the volume of space necessary to store such data, so no
23 more limited sealing would appropriately protect Google’s confidential and proprietary
24 information.
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6. Google considers the amount of raw data collected through GA for Firebase to be highly confidential and proprietary information that is kept confidential both internally at Google and in litigation. For example, the figures Google seeks to keep under seal would reveal the technical underpinnings of the GA for Firebase product, as well as Google’s product design and business strategy, all of which has taken Google years to develop at significant cost. A competitor could use the information to unfairly compete with Google’s product offerings; and a bad actor could use the information to improperly access Google’s systems to target proprietary information. This information should be shielded from unnecessary public disclosure.

7. **Paragraphs 3–6 of the Ganem Declaration**, at “REDACTED” (“... the app measurement logs, which record [REDACTED] entries per day . . .”; “For context, 56 days’ worth of data totals over [REDACTED]”); “. . . data would cost [REDACTED], and three years would cost [REDACTED]; preserving it indefinitely . . .”; “. . . Google would need [REDACTED]. To store one year’s worth of data, Google would need [REDACTED]; for three years: [REDACTED].”), disclose the same confidential information as discussed at paragraphs 5-6 above and should be sealed for the same reasons.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed November 18, 2021, at San Francisco, California.

/s/ Steve Ganem
STEVE GANEM